

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
At Greeneville**

UNITES STATES OF AMERICA,)	
)	CASE NO. 2:20-CR-74
v.)	
)	
)	JUDGE GREER
JERRY TRAPP)	

**MOTION FOR AUTHORIZATION TO TRAVEL OUT OF STATE FOR
ATTORNEY-CLIENT VISIT**

COMES NOW, Jerry Trapp, Defendant, by and through counsel, and files this Motion for Authorization to Travel Out of State to have an in-person conference with Defendant Trapp.

Defendant Trapp is currently being housed in Laurel County, Kentucky, by the United States Marshall Service. Due to the restrictions imposed pursuant to COVID-19 protocols, counsel has not met with Defendant Trapp in-person since he was taken in custody and made his initial appearance before the Court.

As the Court has been aware, the discovery is extremely voluminous in this case. Counsel needs to meet in-person with Defendant Trapp to review the discovery and have direct communication regarding the government's allegations.

Pursuant to the Criminal Justice Act, as adopted and amended in the Eastern District of Tennessee, counsel believes he must obtain authorization from this Court before traveling outside of the State of Tennessee for any matter involving the representation of a defendant. Counsel is therefore seeking authorization or permission from the Court to travel to Kentucky to conduct an in-person jail visit with the Defendant.

WHEREFORE, Defendant prays that this Honorable Court grant this motion and authorize counsel to travel to Laurel County, Kentucky, to have an in-person jail conference with Defendant Trapp.

Respectfully submitted,

s/ Steven G. Moore

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CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2021, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

s/Steven G. Moore
Attorney for Defendant